UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

DEBORAH CHIN, On Behalf of Herself and All Others Similarly Situated, Plaintiff, V. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. Plaintiff, Civil Action No. 04-CV-10294-DPW Hon. Douglas P. Woodlock Civil Action No. 04-CV-10308-DPW Hon. Douglas P. Woodlock Civil Action No. 04-CV-10308-DPW Hon. Douglas P. Woodlock Civil Action No. 04-CV-10308-DPW Hon. Douglas P. Woodlock Flaintiff, V. SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL, Defendants.	DISTRICT OF	MAS	SACHUSETTS ZEG / PR 12 P 5: 22
and All Others Similarly Situated, Plaintiff, V. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly Situated, Plaintiff, V. SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL, Hon. Douglas P. Woodlock Civil Action No. 04-CV-10308-DPW Hon. Douglas P. Woodlock	DEBORAH CHIN, On Behalf of Herself	:	Civil Action No. 04-CV-10294-DPW
Plaintiff, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. : INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly Situated, Plaintiff, v. SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL, : Civil Action No. 04-CV-10308-DPW Hon. Douglas P. Woodlock : L.		:	The Control of the Co
Plaintiff, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. : INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly Situated, Plaintiff, v. SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL, : Civil Action No. 04-CV-10308-DPW Hon. Douglas P. Woodlock : L.	•	:	Hon. Douglas P. Woodlock
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. : INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly Situated, Plaintiff, V. SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL, : Civil Action No. 04-CV-10308-DPW Hon. Douglas P. Woodlock : SONUS NETWORKS, INC., PAUL R. : INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly : INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly : INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly : INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly : INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly : INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly : INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly : INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly : INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly : INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly : INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly : INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly : INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly : INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly : INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly : INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly : INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly : INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly : INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly : INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly : INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly : INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly : INFORMATION DYNAMICS, LLC, On Behalf of	Plaintiff,	:	
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. : INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly Situated, Plaintiff, V. SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL, : Civil Action No. 04-CV-10308-DPW Hon. Douglas P. Woodlock : SONUS NETWORKS, INC., PAUL R. : INFORMATION DYNAMICS, LLC, On SITUATION DYNAMICS, LLC, On SITUATION DYNAMICS, LLC, On SITUATION DESCRIPTION OF THE STATE		 :	
AHMED, and STEPHEN J. NILL, Defendants. INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly Situated, Plaintiff, V. SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL, Civil Action No. 04-CV-10308-DPW Hon. Douglas P. Woodlock SONUS NETWORKS, INC., PAUL R. SONUS NETWORKS, INC., P	v.	:	
AHMED, and STEPHEN J. NILL, Defendants. INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly Situated, Plaintiff, V. SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL, Civil Action No. 04-CV-10308-DPW Hon. Douglas P. Woodlock SONUS NETWORKS, INC., PAUL R. SONUS NETWORKS, INC., P		:	
Defendants. INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly Situated, Plaintiff, V. SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL, Civil Action No. 04-CV-10308-DPW Hon. Douglas P. Woodlock 1 1 1 1 1 1 1 1 1 1 1 1 1	,	:	
INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly Situated, Plaintiff, V. SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL, E Civil Action No. 04-CV-10308-DPW Hon. Douglas P. Woodlock : : : : : : : : : : : : : : : : : :	AHMED, and STEPHEN J. NILL,	:	
INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly Situated, Plaintiff, V. SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL, E Civil Action No. 04-CV-10308-DPW Hon. Douglas P. Woodlock : : : : : : : : : : : : : : : : : :		:	
Behalf of Itself and All Others Similarly Situated, Plaintiff, V. SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL, Hon. Douglas P. Woodlock : : : : : : : : : : : : : : : : : :	Defendants.	:	
Behalf of Itself and All Others Similarly Situated, Plaintiff, V. SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL, Hon. Douglas P. Woodlock : : : : : : : : : : : : : : : : : :		:	
Behalf of Itself and All Others Similarly Situated, Plaintiff, V. SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL, Hon. Douglas P. Woodlock : : : : : : : : : : : : : : : : : :	TITODIA TIONI DI DI DI GOLI I	:	G: 114 - 12 - 14 - 14 - 14 - 14 - 14 - 14
Plaintiff, v. SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL, Hon. Douglas P. Woodlock : : : : : : : : : : : : : : : : : :	1	:	Civil Action No. 04-CV-10308-DPW
Plaintiff, v. SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL, : :		:	Transparation West and
v. SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL, : :	Situated,		Hon. Douglas P. Woodlock
v. SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL, : :	Plaintiff	:	
SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL, :	Flainnii,		
SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL, :	V	1:	
JONES, EDWARD N. HARRIS, J. : MICHAEL O'HARA, HASSAN M. : AHMED and STEPHEN J. NILL, : :	**	:	
JONES, EDWARD N. HARRIS, J. : MICHAEL O'HARA, HASSAN M. : AHMED and STEPHEN J. NILL, : :	SONUS NETWORKS, INC. PAIR, R	:	
MICHAEL O'HARA, HASSAN M. : AHMED and STEPHEN J. NILL, : :		:	
AHMED and STEPHEN J. NILL, : :			
=	,		
Defendants.	· · · · · · · · · · · · · · · · · · ·		
Defendants.			
	Defendants.		

AFFIDAVIT OF RICHARD A. SPEIRS IN SUPPORT OF MOTION OF PLAINTIFF SAVERIO PUGLIESE FOR CONSOLIDATION AND FOR APPOINTMENT OF LEAD PLAINTIFF, LEAD COUNSEL AND LIAISON COUNSEL

MICHELLE TREBITSCH, On Behalf of	T:	Civil Action No. 04-CV-10307-DPW
Herself and All Others Similarly	:	
Situated,	:	Hon. Douglas P. Woodlock
Total 1 11 00	:	
Plaintiff,	:	
V.	:	
, ,	:	
SONUS NETWORKS, INC., HASSAN	:	
AHMED, and STEPHEN J. NILL,	:	
	:	
Defendants.	:	
PETER KALTMAN, Individually and	: :	Civil Action No. 04-CV-10309-DPW
On Behalf of All Others Similarly	:	Civil Action No. 04-C v-10309-DP W
Situated,		Hon. Douglas P. Woodlock
	:	
Plaintiff,	:	
	:	
V.	:	
SONUS NETWORKS, INC., HASSAN	•	
AHMED, and STEPHEN J. NILL,	:	
,	:	
Defendants.	:	
	:	
SAMANTHA DEN, Individually and on Behalf of All Others Similarly Situated,	:	Civil Action No. 04-CV-10310-DPW
Bonan of An Onicis Similarly Situated,	:	Hon. Douglas P. Woodlock
Plaintiff,	:	Tion. Douglas F. Woodlock
v.	:	· •
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SONUS NETWORKS, INC., HASSAN	:	<u> </u>
AHMED, and STEPHEN J. NILL,	:	
Defendants.	:	
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RICHARD CURTIS, on Behalf of	T .	Civil Action No. 04-CV-10314-MLW
Himself and All Others Similarly	:	CIVII ACIION NO. 04-CV-10314-MLW
Situated,	:	Hon. Mark L. Wolf
Bituated,	:	non. Wark L. Won
Plaintiff,	-	
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v.	•	
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SONUS NETWORKS, INC., HASSAN	1:	
AHMED, and STEPHEN J. NILL,		
THE STATE OF THE S	:	
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Defendants.	:	
Doloidants.	:	
RONALD KASSOVER, on Behalf of	:	Civil Action No. 04-CV-10329-DPW
Himself and All Others Similarly	1:	100000000000000000000000000000000000000
Situated,	 :	Hon. Douglas P. Woodlock
	:	
Plaintiff,	:	
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\ v.	:	
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SONUS NETWORKS, INC., HASSAN	 :	
AHMED, and STEPHEN J. NILL,	:	
	:	
Defendants.	 :	
STEVE L. BAKER, Individually and on	:	Civil Action No. 04-CV-10333-DPW
Behalf of All Others Similarly Situated,	:	
	 :	Hon. Douglas P. Woodlock
Plaintiff,	:	
	:	
v.	:	
	:	
SONUS NETWORKS, INC., HASSAN	:	
AHMED, and STEPHEN J. NILL,	:	
	:	
Defendants.	:	
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	;	

SAMUEL HO, Individually and on	:	Civil Action No. 04-CV-10363-DPW
Behalf of All Others Similarly Situated,	:	
	 :	Hon. Douglas P. Woodlock
Plaintiff	:	
	:	
v.	:	
	:	
SONUS NETWORKS, INC., HASSAN	:	
AHMED, and STEPHEN J. NILL,	:	
	:	
Defendants.	:	
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	:	
JEFFREY C. RODRIGUES, Individually	:	Civil Action No. 04-CV-10364-DPW
and on Behalf of All Others Similarly	:	
Situated,	:	Hon. Douglas P. Woodlock
	:	
Plaintiff,	:	
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V.	:	
CONTRACTOR TO THE COLOR	:	
SONUS NETWORKS, INC., HASSAN	:	
AHMED, and STEPHEN J. NILL,	:	
75.0	:	
Defendants.	:	
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RODERT CONTE I MARK	:	
ROBERT CONTE and MARK	:	Civil Action No. 04-CV-10382-DPW
RESPLER, On Behalf of Themselves and all Others Similarly Situated.	:	TT D 1 D 777
an Others Similarly Situated,	:	Hon. Douglas P. Woodlock
Plaintiff		
riammi	•	
v.		
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SONUS NETWORKS, INC., HASSAN		
AHMED, and STEPHEN J. NILL,	:	
The state of the s	:	
Defendants.	:	
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WHEATON ELECTRICAL SERVICES	T:	Civil Action No. 04-CV-10383-DPW
RETIREMENT 401K PROFIT	:	
SHARING, On Behalf of Itself and All	:	Hon. Douglas P. Woodlock
Others Similarly Situated,	:	
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Plaintiff,	:	
	:	
v.	1:	
	:	
SONUS NETWORKS, INC., HASSAN	:	
AHMED, and STEPHEN J. NILL,	:	
, i	:	
	:	
Defendants.	'	
BRIAN CLARK, On Behalf of Himself	:	Civil Action No. 04-CV-10454-DPW
and All Others Similarly Situated,		TOTOT-DI W
,		Hon. Douglas P. Woodlock
Plaintiff,		LIOM DOUGHUS I. WOUGHOOK
1 100,1111,	:	
v.	:	
	:	
SONUS NETWORKS, INC., PAUL R.		
JONES, EDWARD N. HARRIS, J.	:	
MICHAEL O'HARA, HASSAN M.	:	
AHMED and STEPHEN J. NILL,	-	
2 STATULE and DILLITED J. INILL,	:	
Dofordant	:	
Defendants.		
SHEILA BROWNWELL, On Behalf of	:	Civil Action No. 04-CV-10597-DPW
Herself and All Others Similarly Situated,	:	77
Situatou,	:	Hon. Douglas P. Woodlock
Districe	:	
Plaintiff,	:	·
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V.	:	
CONITCATEGRACORICS	:	
SONUS NETWORKS, INC., HASSAN	:	
AHMED, and STEPHEN J. NILL,	:	
	:	
	:	
Defendants.	:	
SAVERIO PUGLIESE, On Behalf of	;	Civil Action No. 04-CV-10612-DPW
Himself and All Others Similarly	:	- · · · · · · · · · · · · · · · · · · ·
Situated,	:	Hon. Douglas P. Woodlock
	:	
Plaintiff,	:	

v.	:	
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,	:	
	:	
Defendants.	:	
DAVID V. NOCITO, On Behalf of Himself and All Others Similarly	:	Civil Action No. 04-CV-10623-DPW
Situated,	:	Hon. Douglas P. Woodlock
Plaintiff,	:	
v.	: :	
SONUS NETWORKS, INC., HASSAN		
AHMED, and STEPHEN J. NILL,	:	
	:	
Defendants.	:	

STATE OF NEW YORK)
) ss
COUNTY OF NEW YORK)

I, Richard A. Speirs, being duly sworn, depose and say:

- 1. I am a member of the firm of Zwerling, Schachter & Zwerling, LLP (the "Zwerling Firm"), one of the attorneys for Saverio Pugliese. I am fully familiar with all the facts and circumstances herein.
- 2. This affidavit is submitted in support of the motion of Saverio Pugliese pursuant to Rule 42(a) of the Federal Rules of Civil Procedure, and Section 21(a)(3)(B) of the Securities Exchange Act of 1934 as amended by the Private Securities Litigation Reform Act of 1995, for consolidation and for appointment of Lead Plaintiff, Lead Counsel and Liaison Counsel in the above-captioned actions.

- 3. Attached hereto as Exhibit A is a true and correct copy of the complaint filed in the action Pugliese, et al. v. Somus Networks, Inc., et al., No. 04-CV-10612-DPW (filed March 30, 2004).
- Attached hereto as Exhibit B is the Certification of Saverio Pugliese in Support of Motion for Consolidation and for Appointment of Lead Plaintiff, Lead Counsel and Liaison Counsel.
- Attached hereto as Exhibit C is a true and correct copy of the first notice 5.. of a class action relating to Sonus Networks, Inc. ("Sonus"), dated February 12, 2004, issued by Cauley Geller Bowman & Rudman, LLP.
- Attached hercto as Exhibit D is a firm resume of the Zwerling Firm, Pugliese's choice for Lead Counsel.
- Attached hereto as Exhibit E is a firm resume of Berman DeValerio Pease Tabacco Burt & Pucillo, Pugliese's choice for Liaison Counsel.

Richard A. Speirs

Sworn to before me this day of April, 2004

Public, State Of New York No.015C8067685 Qualified in Queens County Commission Expires Fab. 18, 260